

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

HSA ST. JOSEPH LLC

v.

CLINT SOSA

Case No. 4:25-cv-01411

**NOTICE OF MOTION FOR  
TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 65 and 57, Petitioner hereby moves this Court to issue a Temporary Restraining Order and Preliminary Injunction enjoining Defendant Sosa from accessing Plaintiff HSA St. Joseph LLC's (SJMC) and parent company Healthcare Systems of America's (HSA) social media and web accounts and ordering Defendant to restore access including multi-factor authentication to Plaintiff, pending further proceedings before this Court. In support of this motion, Petitioner respectfully submits a Memorandum of Law and supporting Exhibits and Declaration.

As detailed on pages in the accompanying Memorandum of Law and supporting materials, Plaintiff continues to withhold access to the accounts by Plaintiff, the rightful owner, despite repeated demands.

SJMC and the HSA hospitals need access to these accounts immediately and delays are causing damage and loss for the Plaintiff.

On March 25, 2025, the Defendant demanded Plaintiff pay additional consideration even though he is unauthorized to access the social media accounts. This led Plaintiff to seek emergency relief as well.

ECF-stamped copies of this notice of motion and the memorandum of law in support of this motion, and the supporting materials will be provided to Defendant via email upon filing.

Dated: March 27, 2025  
Houston, Texas

Respectfully submitted

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